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January 17, 2025

VIA ECF

Hon. Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Adams v. New York County District Attorney's Office et al.*
1:23-cv-10574 (DLC)

Dear Magistrate Judge Figueredo:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing Defendants New York County District Attorney's Office and City of New York in the above-referenced action. I write on behalf of all parties to respectfully ask the Court to reschedule the settlement conference currently set for January 27, 2025 at 10:00 a.m. (ECF No. 34). Three mutually agreeable dates for the settlement conference include February 28, March 3, or March 4, 2025. Along with this motion, the parties are filing a motion addressed to District Judge Cote requesting an extension of fact discovery to March 31, 2025.

This is the first request by the parties to adjourn the settlement conference. The adjournment is requested because Defendants have not yet received settlement authority and do not anticipate that they would likely receive final authority prior to January 27, and thus would not be able to meaningfully participate in settlement discussions. Moreover, the parties have exchanged paper discovery, but some electronic discovery remains outstanding, as well as Defendants' deposition of Plaintiff and Plaintiff's depositions of Patricia Cunningham, George Argyros, and Nitin Savur. The requested adjournment would allow the parties to complete their exchange of documents and take further depositions. The requested adjournment would also allow the parties to participate in settlement discussions prior to the settlement conference, either to resolve the matter entirely or at least bring the parties closer together as the conference approaches.

Accordingly, the parties request that the settlement conference currently set for January 27, 2025 at 10:00 a.m. be adjourned. I thank the Court for its consideration and attention to this matter.

Respectfully submitted,



Steven E. Smith
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 1/21/25

The settlement conference scheduled for January 27, 2025 at 10:00 a.m. is rescheduled for **May 5, 2025 at 10 a.m.** in Courtroom 17-A, United States Courthouse, 500 Pearl Street, New York, New York. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to prepare pre-conference submissions in accordance with the Judge Figueredo's Standing Order Applicable to Settlement Conferences (located at <https://www.nysd.uscourts.gov/hon-valerie-figueredo>). Pre-conference submissions must be received by the Court no later than April 28, 2025. The Clerk of Court is directed to terminate the motion at ECF No. 36.